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Re: *United States v. Carlos Mor*
Dkt.: 23 Cr 615

Hon. Philip M. Halpern
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Dear Judge Halpern:

In the matter of *US v. Carlos Mor*
22, 2024, I have not yet received the initial draft of the probation and sentencing report. I contacted Probation and the initial draft is expected to be disclosed this week. My sentencing memo, per the Court's instructions at the plea, is due on Monday, April 1 (3 weeks prior to the sentencing). In this scenario, my client will not have had time to review the draft report and make objections (14 days per FRCrP 32(e)(2) and (f)(1)), plus time after receiving the final probation report, recommendation, and justification from the probation officer. Therefore, I write to the Court to request an adjournment of the sentencing date for approximately 4 weeks.

I have reached out to the Government but I have not yet heard back.

If it is convenient to the Court, I request any day during the weeks of May 20-24 or May 28-31. I have advised my client that I am making this request and he consents.

I thank the Court for its consideration of my request. If the Court has any questions, please do not hesitate to contact me.

Very truly yours,
Sam Braverman
Samuel M. Braverman, Esq.
National Co-Chair,
Government Enforcement,
Internal Investigations, and
White-Collar Defense Group

Application granted. The sentencing scheduled for April 22, 2024 is hereby adjourned to the Court's next available sentencing date of August 20, 2024 at 2:30 p.m. The Court will advance the sentencing date if an earlier date becomes available so Defendant's sentencing submission is due by May 17, 2024 and the Government's response is due by May 24, 2024.

The Clerk of Court is respectfully directed to terminate the pending letter-motion (Doc. 41).

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
March 29, 2024